



November 6, 2008

Mr. Bill Ryan
US EPA Region X
1200 Sixth Avenue – ECL-113
Seattle, WA 98101

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Remedial
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Environmental
Cleanup Office

Re: October 2008 Monthly
Report

Dear Mr. Ryan:

This letter serves as the monthly progress report for October 2008, in accordance with Section X, Paragraph 29 of the RD/RA Consent Decree for the Tronox site, in Soda Springs, Idaho.

October Activities

The calcine cap and landfill facilities were inspected in October. The cover surfaces on both facilities are in good condition, with minimal disturbance from digging animals. The landfill was pumped in October to a nearby concrete holding pond to maintain the minimal level on the landfill liner. The gates on both facilities are closed and locked and the fences are in good condition.

The 10-acre pond was inspected and the water level was measured. The 10-acre pond contains about 7.5 inches of water on the south end. The 10-acre pond was pumped within containment to surrounding beach areas to enhance evaporative effects and to reduce the level of the pond. During the month of October, Rainy Day Water, a liner contractor company from Salt Lake City, Utah mobilized to the site to repair a separation on the 10-acre pond 4-inch PVC sump pipe that recently occurred. Two other small holes on the south end of the 10-acre pond liner were also repaired. All repairs were made to locations on the pipe and liner above the pond water level.

Work on the development of the DQO commenced at the end of September following our conference call on September 26, when EPA requested an expanded evaluation of the DQO to be added to the revised draft Addendum 1 work plan transmitted to EPA on September 9, 2008. The draft revised DQO section was transmitted to you electronically in mid-October for a preliminary review, prior to incorporation into the third revision of the Addendum 1 work plan. We understand, based on the September 26 conference call, that EPA has other minor comments relating to the to the revised draft Addendum 1 work plan that will also need to be incorporated into the third revision of the Addendum 1 work plan.

During October, the second round of ground and surface water samples were collected from all of the site wells and shipped under chain of custody for analysis. This sampling

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round included the additional requested field DO and ORP measurements and additional requested analytical parameters including dissolved iron and manganese, silica, total organic carbon and ammonia. Wells KM-1 and KM-10 were also sampled for the first time since November 1992 using low-flow methods. Arsenic analytical detection limit requirements are 5 ug/l, as required in the Addendum 1 SOW.

November/December 2008 Activities

During the months of November and December, Tronox will continue to monitor the cap, landfill and the 10-acre pond. Tronox will provide EPA with agreed-upon changes to the revised draft work plan that will include the DQO planning evaluation. It is contemplated that the third revision of the Addendum 1 work plan will be completed and transmitted to EPA in November 2008, following our receipt of your comments to the revised draft Addendum 1 work plan that was transmitted on September 9, 2008.

During November, Tronox will continue to work on the draft remedy evaluation report, currently scheduled for delivery one month after approval of the third revision of the Addendum 1 work plan. Analytical results from the October sampling should also become available in late November. Results of the October 2008 sampling will be evaluated in conjunction with previous results. During December, it is anticipated that the draft remedy evaluation report will be completed, depending on the timing of the approval of the work plan.

No community relation activities are planned for this period.

Problems or Delays

No delays are expected.

If you have any questions about the work or additional information is required with regards to the work described above, please contact me at (208) 547-3331, extension 233, or (208) 221-6132 (cell).

Sincerely,
Tronox Inc.



Boyd Schvaneveldt

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